

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO

FILED

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CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

1:19 CV 2048

**Regina Bryant**

Plaintiff

CASE NO.

-vs-

JUDGE

**JUDGE OLIVER**

**Robert L. Wilkie, Secretary**  
**U.S Department of Veterans Affairs**  
**Agency**  
Defendant(s)

**MAG. JUDGE PARKER**  
COMPLAINT

## The Parties

### Plaintiff

**Regina Bryant**  
**11410 Scottwood Ave**  
**Cleveland, Ohio 44108**

**Plaintiff :** Regina Bryant has worked as a Sterile Processing Tech as a surgical instrument tech at Louis Stokes VA Medical Center Cleveland for over five years. Plaintiff has a learning disability and is in a protective class, hired at VA medical center as a Schedule A candidate.

### Defendant:

**Robert L. Wilkie**  
**The Head of the Department of Veterans**  
**Veteran Affairs Building**  
**810 Vermont Avenue**  
**Washington D.C**

**Defendant :** Robert L. Wilkie the Head of the Department of Veterans ( the Secretary of Veterans Affairs) the defendant or a member of the defendant's management knew or should have known of the harassment and failed to take prompt, effective remedial action reasonably calculated to end the harassment.

## **Statement of the Claim**

**The plaintiff (Regina Bryant) was subjected to a Hostile Work Environment, Harassment, based on Reprisal and Negligence Under Title VII of Civil Right act of 1964**

**The lead tech of Sterile Processing department at Louis Stokes VA Medical Center Kara Deal utilized her position of power as authority figure in the department to form a Click (Select group of friends).**

**Mrs. Deal used her click of friends to promote a hostile work environment for Plaintiff (Regina Bryant) and encouraged a gang like mentality amongst the employees.**

**The Plaintiff (Regina Bryant) was contently being harassed, bullied and belittled in found of other co-worked and management by the lead tech Kara Deal.**

**Management chose to use a blind eye to Mrs. Deal unprofessional behavior towards the plaintiff (Regina Bryant) and ignore the situation entirely. Even though Plaintiff repeatedly complain to supervisor.**

**Management contributed to this hostile work environment by allowing the harassment, bullying, belittle and Sabotaging of plaintiff work to continue ever after plaintiff file an EEO complaint for harassment.**

**The harassment and sabotaging became much worse after Plaintiff file an EEO complaint. The lead tech Kara Deal told everyone in the department about the plaintiff file an EEO Complaint. People would come to the plaintiff and say she is a troublemaker or say you better stay away from her she will claim you are bullying her.**

**There was no regard for the privacy act at all. This case was supposed to be kept confidential but Mrs. Deal and her click of friends make sure everyone in the department and other departments know about this case. It became an extremely hostile work environment. Plaintiff dreaded going to work.**

16 **Plaintiff continuously complaining to supervisor Jeremy Pravilik, about the harassment and sabotaging of plaintiff work. The supervisor assured plaintiff that he was reported the incidents to upper management.**

17 **Plaintiff also complained to assistant chief Shawn Huelsman and the chief of Sterile Processing Shirley Kissel, both verbally and by email, about the harassment and sabotage done by lead tech and her click of friends. Nothing was done.**

18 **Management themselves broke the privacy act by discussing out loud with other staff members and some of my co-worker plaintiff EEO complaint.**

19 **Which is a prime example of negligence on management part.**

20 **Management inability to take action to stop the harassment give Mrs. Deal validation to continue to publicly humiliate the plaintiff in front of other co-worker.**

21 **An example of this is if the plaintiff made a mistake at work Mrs. Deal would make a big scene about it, talking loudly or yelling so everyone in the department could hear what she was talking about.**

22 **When other co-worker made mistake Mrs. Deal world take them aside and talk to them quietly, so no one knew what was going. The plaintiff was the only person the lead tech did this to.**

23 **The plaintiff was made to look like she was incompetent at her job, by the lead tech, in front of the entire department. This happened many times right in front of management, who did absolutely nothing about the lead tech abusive behavior.**

24 **The plaintiff complained to my supervisor many times about the lead behavior towards her, but nothing was done. What is even more astounding is neither the supervisor nor the assistant chief took the time to document any of my complaints.**

25 **Another example of the lead tech Kara Deal harassing plaintiff and making it a hostile work environment is when she moved the CD player.**

26 **The lead tech Kara Deal decided that she wanted to move the CD player from where it had been set for the past 3 years next to plaintiff's desk. When plaintiff asked her why she moved the CD player, she stating that she couldn't hear the music from across the room.**

27 **So the lead put the CD played next to plaintiff's desk, not next to her own desk, but next to plaintiff desk. Knowing full well that plaintiff has a documented learning disability, because plaintiff told Mrs. Deal the first day she started working in the department.**

28 **When plaintiff asked the lead tech Kara Deal to move the CD player because plaintiff could not concentrate on her work with the music blasting in her ears, the lead tech told plaintiff she should move to another desk.**

29 **Most of the people in the department were afraid to even interact with plaintiff because they didn't want the lead tech Kara Deal and her select group of friends to retaliate against them.**

30 **The lead tech used her role as a supervisory figure to alienate other co-worker from plaintiff. No one was allow to talk to plaintiff unless it was work related, especially new people. This was Mrs. Deal form of isolating plaintiff. That how much power and influencer this lead tech had over the entire department.**

31 **There was a strong since of street gang mentality going on in the department. Management did everything they could to try to ignore the situation that includes disregarding the plaintiff complaints.**

32 **The Plaintiff (Regina Bryant) instrument trays and case cart for surgery were being sabotage. All these things that were crucial for the safety of the surgery were literally being sabotage.**

33 **The Plaintiff had to check and recheck instrument trays and case carts for the OR several times to make sure they were correct, because of the sabotaging that was going on daily. All of this was brought to management's attention, nothing was done to stop the harassment.**

34 **It is one thing for the plaintiff to have to double check trays and case carts**  
because of her learning disability. The plaintiff was forced to recheck trays  
and case carts 3 to 4 times, because she was afraid the lead tech or the  
lead tech click of friend would sabotage them.

35 **Plaintiff believe this was all done in retaliation for filing an EEO complaint**  
for harassment.

36 **The stress from being harassed, sabotage, publicly humiliated in front of**  
the entire department has cause a rapid decline on the plaintiff (Regina  
Bryant) health.

37 **The lack of management's intervention in this situation has affected**  
plaintiff mentally, physically and psychologically. The plaintiff has develop  
Depression, Anxiety attacks, hypertension, emotional distress, withdraw  
from friend and family.

38 **Plaintiff became so depressed that she had to start getting counseling**  
emotional distress, Plaintiff's doctor put her on medication for Depression,  
Anxiety attacks and Hypertension. The plaintiff's doctor diagnosed her  
with Pseudo dementia from depression and constant stress.

39 **Plaintiff started using all her sick days and her FMLA because she**  
dreaded going to work, this went on for 3 years. The effect of all this has  
left me with a decline in my health. Which plaintiff doctors have  
documented several times.

40 **In addition to the claim stated below, the plaintiff (Regina Bryant) was also**  
subject to retaliate by lead tech Kara Deal, in the form of unfair  
scheduling.

41 **The lead tech who made up the work schedule for the staff, would**  
schedule the Plaintiff back to back heavy duty.

42 **The effect on plaintiff physically from being forced to stand on her feet**  
back to back cause plaintiff's legs, feet and ankles to swollen. It also  
cause plaintiff to develop horrible varicose vein.

43 **Plaintiff's doctor prescribed compression stocking for the muscle cramping, and swelling in plaintiff's lower legs. The varicose vein are permanent. The plaintiff cannot wear short pants or dresses because she is afraid of people seeing how horrible her legs look because of the varicose veins.**

44 **Many of the events listed below were a result of retaliation by lead tech Kara Deal because the Plaintiff file and EEO complain for harassment.**

45 **Claim Presented**

46 **The plaintiff seeks damages from the defendant for a Hostile Work Environment, Harassment, Reprisal, and Negligence under the Civil Right Title VII 42:2000E**

47 **Event 1: On April 20, 2014, Kara Deal (KD) Lead Technician Sterile Processing Service (SPS) and alleged harasses, instructed the Complainant to pull cases for a new employee and when it was not completed, KD yelled in a loud voice for others to hear, "All I ask you to do is to pull his cases out of the computer. I can't understand why you didn't get it done!"**

48 **Event 2: In December 2014, and on other occasions, KD would ask the Complainant was not she still on probation, whenever the Complainant attempted to stand up to her bullying.**

49 **Event 3: In June 2015, and ongoing, KD told the Complainant to go to lunch and had a habit of interrupting her and not wanting the Complainant to talk with coworker or managers.**

50 **Event 4: In July 2015, KD would consistently give the Complainant the largest amount of cases to pull and would ask her why she was not pulling them out of the computer as fast as the other technicians, placing pressure on the Complainant but not on others.**



51 **Event 5: On August 24, 2015, KD singled out the Complainant and argued over her 1:00 p.m. lunch break that had been approved by management.**

52 **Event 6: On August 27, 2015, KD blamed the Complainant, rolled her eyes at her and accused of her running a wet Ram-B load when it was KD's friends who made an error that KD was trying to cover up.**

53 **Event 7: On September 11, 2015, KD, knowing of the Complainant's disability, told the Complainant that a missing cord belonged to Complainant's set, and then stated that she must have made a mistake when the Complainant corrected her.**

54 **Event 8: On September 23, 2015, KD accused the Complainant of not stamping the date on basins, despite the supervisor's confirmation that the dates were stamped.**

55 **Event 9: In October 2015, KD aware of the Complainant's disability and memory problems, said in a loud voice for others to hear, "How is it that everyone in here knows how to package [pill pack dental instruments] this but you...we do this every day."**

56 **Event 10: On November 13, 2015, KD intimidated the Complainant and told her to process items that the Complainant had not seen before and did not know how to process as the items were clearly marked, "DO NOT PROCESS."**

57 **Event 11: On December 14, 2015, after the CD player had been on the other side of the room for three (3) years, KD moved the player next to the Complainant's desk and refused to remove it despite her knowledge that the Complainant has a problem with concentration.**

58 **Event 12: On December 15, 2015, KD told the Complainant to stop assisting a new employee because she was distracting him, but KD did not tell other coworkers the same thing when they attempted to assist the new employee.**

59 **Event 13: On January 5 and 19, 2016, KD placed the CD player, which was previously removed from Complainant's work area that the Complainant's request due to her disability, back near the Complainant's workspace causing emotional stress.**

60 **Event 14: On January 8, 2016, KD became angry when the Complainant offered to help a new employee.**

61 **Event 15: On January 8, 2016, KD embarrassed and humiliated the Complainant in front of her peers when she screamed at the Complainant, "Regina, what are you doing? Leave the autoclave alone!"**

62 **Event 16: On January 13, 2016, and other occasions, KD would showed her disapproval with the Complainant's 1:00 p.m. lunchbreak schedule and when Complainant returned from lunch, coworkers were laughing and saying, "Kara (KD), I'm not a shit-starter like Regina (Complainant)," and KD responded, "I didn't say you were like Regina," as they continued to laugh.**

63 **Event 17: On January 19, 2016, KD moved the CD player back next to the Complainant's desk shortly after the Complainant had returned it to its original location.**

64 **Event 18: On January 27, 2016, the Complainant had to turn the CD player's volume down five (5) times after it was mysteriously turned up.**

65 **Event 19: On January 28, 2016, the Complainant was told the KD was going about their work unit and medical center talking about an incident that occurred between the Complainant and KD involving a radio.**



66 **Event 20: On January 28, 2016, when the Complainant came into the prep room, music (from the CD player) was not on but, when the Complainant sat down at her desk, KD came over and turned on the CD player while coworkers watched and laughed.**

67 **Event 21: On January 28, 2016, a non-coworker from the distribution department barely known to the Complainant, approached the Complainant's worker and said that she had better stay away from the Complainant "because she's the one who keeps all of the trouble going on around here."**

68 **Event 22: On January 29, 2016, a coworker from the third shift approached the Complainant and said that they had heard that the Complainant was having mediation with KD, which the Complainant believed to be confidential.**

69 **Event 23: On or about February 1, 2016, after the Complainant returned from sick leave, KD had taken the CD player, causing coworkers to become upset concerning its whereabouts and blaming the Complainant for its disappearance.**

70 **Event 24: On March 9, 2016, KD, attempted to sabotage and cause problems for the Complainant by not preparing the appropriate amount of labels for the dental trays that the Complainant was responsible for wrapping.**

71 **Event 25: On March 16, 2016, the Complainant was assigned to the Sterrad room and three (3) boxes of biological indicator strips, which had been there the day before, were mysteriously missing.**

72 **Event 26: On March 17, 2016, the day of a Joint Commission Inspection, the Complainant's desk drawer mysteriously contained the indicator strips that were not there the night before, and are not allowed outside of the Sterrad room per medical center regulations.**

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**Event 27: On March 23, 2016, the Complainant found a long dark strand of hair on her laparoscopic tray after coming from break, which was not there before, and only KD and one of KD's friends were in the same prep room as the Complainant that day.**

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**Event 28: On April 10, 2017 prescription eyeglasses were stolen off of complainant's desk.**

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**Event 29: On April 10, 2017 Sterrad Instruction papers disappeared from the Sterrad room on the day complainant was assigned to work in the sterrad room.**

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**Event 30: On May 1, 2017 Complainant was sabotaged when she was the OR Runner.**

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## **Damages**

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**The Plaintiff is asking the court to be given award of both  
Compensatory Damage and Punitive damage.**

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**The plaintiff is asking for the amount of \$300,000 for a facility  
with over 500 employees**

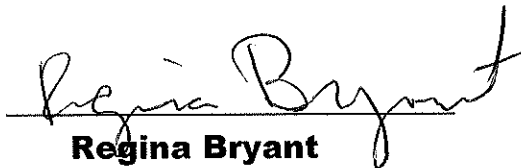
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## **Jury Trial**

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**The plaintiff is requesting a trial by Jury made up of mostly  
veterans. Veterans are the ones who would have been mostly  
affected by the sabotage of instrument trays and cast carts.**

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**Regina Bryant**  
**11410 Scottwood Ave**  
**Cleveland, Ohio 44108**

9/5/2019